

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. 25-</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b>
<b>MARK ANTHONY TUCCI</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 245(b)(2) (threat to use</b>
	<b>:</b>	<b>dangerous weapon interfering with</b>
	<b>:</b>	<b>federally protected activities – 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 2261A (cyberstalking – 1</b>
	<b>:</b>	<b>count)</b>
	<b>:</b>	<b>18 U.S.C. § 875(c) (interstate</b>
	<b>:</b>	<b>communication of threats – 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 245(b)(2) (threats interfering</b>
	<b>:</b>	<b>with federally protected activities – 1</b>
	<b>:</b>	<b>count)</b>

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this information:

1. Defendant MARK ANTHONY TUCCI resided in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania.
2. Interstate 95 (“I-95”) was a public road and interstate highway that connected states along the east coast of the United States, between Florida and Maine, including Pennsylvania. Route I-95 ran through major metropolitan areas along its route, including Philadelphia, Pennsylvania.
3. I-95 was a highway that was federally funded and administered by the states, including the Commonwealth of Pennsylvania and its subdivision.

4. N.O., who is known to the United States Attorney, is African American.

5. On or about February 1, 2024, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MARK ANTHONY TUCCI,**

by force and threat of force, willfully intimidated and interfered with, and attempted to intimidate and interfere with, N.O., because of N.O.'s race and color, and because N.O. was enjoying a facility provided and administered by a State and a subdivision thereof, that is, driving on route I-95, and threatened to use a dangerous weapon, that is, a firearm, when defendant TUCCI repeatedly yelled threats to shoot and kill N.O., including, "YOU'RE A NI\*\*\*R [*expletive*], I'M GOING TO KILL YOU NI\*\*\*R [*expletive*]! I'M GOING TO SHOOT YOU!" and threw a mug at N.O.'s vehicle while N.O. was driving on I-95, causing damage to N.O.'s vehicle.

In violation of Title 18, United States Code, Section 245(b)(2)(B).

**COUNT TWO**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

At all times material to this information:

1. Paragraph 1 of Count One is incorporated here.
2. S.S., R.S. and H.R., who are all persons known to the United States Attorney, were employed by Philadelphia Agency 1, an agency that is known to the United States Attorney. S.S. and R.S. are African American.
3. Philadelphia Agency 1, which was located in Philadelphia, Pennsylvania, was an agency of the City of Philadelphia, that is, a subdivision of the Commonwealth of Pennsylvania.
4. S.S. specifically worked in a department within Philadelphia Agency 1 that handled matters involving, among other things, child welfare.
5. From on or about May 23, 2024, through on or about June 3, 2024, in the Eastern District of Pennsylvania, defendant

**MARK ANTHONY TUCCI,**

with the intent to harass and intimidate S.S., used a facility of interstate and foreign commerce, that is, electronic mail, text messages, and phone calls, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to S.S.

**DEFENDANT TUCCI'S COURSE OF CONDUCT TARGETING S.S.**

6. From on or about May 23, 2024, through on or about June 3, 2024, defendant MARK TUCCI repeatedly called and sent text messages and e-mails that consisted of threats to harm S.S. and S.S.'s colleagues at Philadelphia Agency 1.

7. On or about April 18, 2024, defendant MARK TUCCI e-mailed S.S. in S.S.'s capacity as an employee of Philadelphia Agency 1 to request records relating to an investigation involving defendant TUCCI's child.

8. On or about May 23, 2024, through June 2, 2024, defendant MARK TUCCI sent five e-mails to S.S. to check on the status of his request and asking S.S. to send him records relating to his child. On or about May 29, 2024, defendant TUCCI wrote to S.S. via e-mail, "You are being complicit in not sending these records. Who are you protecting?" This e-mail attached a video claiming that a senator had been killed after "exposing" child protective services programs.

9. On or about June 3, 2024, defendant MARK TUCCI repeatedly called Philadelphia Agency 1.

10. During two of the June 3 calls to Philadelphia Agency 1, defendant MARK TUCCI spoke to S.S. Defendant TUCCI identified himself by name, and screamed at S.S., causing S.S. to hang up. Defendant TUCCI called back and continued to yell at S.S., and S.S. hung up again.

11. During one of the June 3 calls to Philadelphia Agency 1, defendant MARK TUCCI spoke to R.S. Defendant TUCCI asked if it was S.S., to which R.S. responded, "No." Defendant TUCCI then said to R.S., "Yes it is, you ni\*\*\*r [*expletive*]," and called R.S. a "ni\*\*\*r [*expletive*]" several times. R.S. hung up, and defendant TUCCI continued to call back several more times.

12. After defendant MARK TUCCI's calls to S.S. and R.S., H.R. called defendant TUCCI back on his cell phone on June 3, 2024. Defendant TUCCI demanded that H.R. provide defendant TUCCI's child's records to him, and said that everyone at Philadelphia

Agency 1 was a “ni\*\*\*er.” Defendant TUCCI said to H.R. that defendant TUCCI was going to come down to Philadelphia Agency 1 the next day, and that he was going to hurt everyone, in particular, that he had S.S.’s home address and was going to hurt her.

13. On or about June 3, 2024, defendant MARK TUCCI sent the below e-mails to S.S. at the below-listed approximate times:

<b>Date and Time</b>	<b>Subject Line</b>	<b>Body of E-Mail</b>
6/3/2024 2:52pm	Ni***r [ <i>expletive</i> ]	Thank You Mark
6/3/2024 2:53pm	Ni***r [ <i>expletive</i> ]	Thank You Mark
6/3/2024 2:53pm	No one was yelling fat lazy ni***r [ <i>expletive</i> ]	I know where you live and will be at your home Thank You Mark
6/3/2024 2:53pm	I know where you live ni***r [ <i>expletive</i> ]	Thank You Mark
6/3/2024 2:54pm	Your name is now on the police report ni***r [ <i>expletive</i> ]	Thank You Mark
6/3/2024 2:59pm	Typical racist ni***r [ <i>expletive</i> ]	You motherfuckers are gonna regret this shit. First time your lazy koolaid drinking ass picked up in weeks. Then you hang up your complicit in protecting these creeps let’s hope they protect you ni**r [ <i>expletive</i> ] Thank You Mark

14. On or about June 3, 2024, starting at approximately 3:05pm, defendant MARK TUCCI sent the following text messages from his cell phone to S.S.'s personal cell phone, where each line sets forth a separate text message:

[*street name*] street  
[*S.S. 's name*]  
You think I'm playing  
Every attempt has been documented  
This is personal now  
You wanna fuck with my family  
Now your [*sic*] fucked  
Can't hang up on me In person c\*\*t [*expletive*]

In violation of Title 18, United States Code, Section 2261A(2)(B).

**COUNT THREE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

At all times material to this information:

1. Paragraph 1 of Count One, and Paragraphs 2 through 4 and 6 through 14 of Count Two are incorporated here.

2. On or about June 3, 2024, in the Eastern District of Pennsylvania, defendant

**MARK ANTHONY TUCCI**

knowingly and willfully, with the knowledge that the communication would be viewed as a threat and for the purpose of issuing a threat, transmitted in interstate commerce a communication, that is, six e-mail messages and eight text messages to victim S.S., known to the United States Attorney, and a phone call to H.R., known to the United States Attorney, which contained threats to injure S.S.

In violation of Title 18, United States Code, Section 875(c).

**COUNT FOUR**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

At all times material to this information:

1. Paragraph 1 of Count One, and Paragraphs 2 through 4 and 6 through 14 of Count Two are incorporated here.

2. On or about June 3, 2024, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MARK ANTHONY TUCCI,**

by threat of force, willfully intimidated and interfered with S.S., known to the United States Attorney, and attempted to intimidate and interfere with S.S., because of S.S.'s race and color, and because S.S. was enjoying employment by, and all perquisites of, an agency of the City of Philadelphia, a subdivision of the Commonwealth of Pennsylvania.

In violation of Title 18, United States Code, Section 245(b)(2)(C).



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**NELSON S.T. THAYER, JR.**  
**ACTING UNITED STATES ATTORNEY**



No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

Eastern District of Pennsylvania

Criminal Division

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**THE UNITED STATES OF AMERICA**

vs.

**MARK ANTHONY TUCCI**

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**INFORMATION**

**Counts**

18 U.S.C. § 245(b)(2) (threat to use dangerous weapon interfering with federally protected activities – 1 count)

18 U.S.C. § 2261A (cyberstalking – 1 count)

18 U.S.C. § 875(c) (interstate communication of threats – 1 count)

18 U.S.C. § 245(b)(2) (threats interfering with federally protected activities – 1 count)

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A true bill.

\_\_\_\_\_  
Foreperson

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Filed in open court this \_\_\_\_\_ day,  
Of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

\_\_\_\_\_  
Foreperson

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Bail, \$ \_\_\_\_\_

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